

Gregg M. Galardi  
David B. Hennes  
Michael S. Winograd  
ROPES & GRAY LLP  
1211 Avenue of the Americas  
New York, NY 10036-8704  
Telephone: (212) 596-9000  
Facsimile: (212) 596-9090

*Proposed Counsel to the Debtor  
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

Gawker Media, LLC.,<sup>1</sup>

Debtor.

Gawker Media, LLC,

Plaintiff,

v.

Meanith Huon; Ashley Terrill; Teresa Thomas; Shiva  
Ayyadurai; Terry Gene Bollea; Charles C. Johnson; and  
Got News LLC,

Defendants.

Chapter 11

Case No. 16-11700 (SMB)

Adv. Proc. No. 16-\_\_\_\_\_ ( )

**DEBTOR'S MOTION FOR (I) A PRELIMINARY  
INJUNCTION AND/OR (II) EXTENSION OF THE AUTOMATIC STAY**

Pursuant to sections 105 and 362(a) of title 11 of the United States Code, Rule 65 of the Federal Rules of Civil Procedure, made applicable hereto by Rule 7065 of the Federal Rules of Bankruptcy Procedure, and Rule 7001(7) of the Federal Rules of Bankruptcy Procedure, the Debtor in the above-captioned Chapter 11 proceeding and Plaintiff in the above-captioned

<sup>1</sup> The last four digits of the taxpayer identification number of the Debtor, Gawker Media, LLC, are 0492. The Debtor's corporate headquarters is located at 114 Fifth Avenue, 2d Floor, New York, New York 10011.

Adversary Action respectfully moves this Court for an Order: (1) issuing a preliminary injunction enjoining, pending the termination of the automatic stay applicable to the Debtor, (A) the following existing lawsuits against the Debtor: (i) *Bollea v. Gawker Media, LLC, et al.*, No. 12012447-CI-011 (Fla. 6th Jud. Cir. Pinellas Cty.); (ii) *Huon v. Denton, et al.*, No. 11-cv-03054 (N.D. Ill.) and on appeal No. 15-3049 (7th Cir.); (iii) *Ashley Terrill v. Gawker Media, LLC, et al.*, No. 16-CV-00411 (S.D.N.Y.); (iv) *Teresa Thomas v. Gawker Media LLC, et al.*, No. 16-CV-09519 (Or. Multnomah Cty. Cir. Ct.); (v) *Ayyadurai v. Gawker Media, LLC, et al.*, No. 16-CV-10853 (D. Mass.); and (vi) *Charles C. Johnson, et al. v. Gawker Media, LLC, et al.*, No. 15CECG03734 (Cal. Super. Ct. Fresno Cty.) (collectively, the “Actions”), as against certain non-debtor parties who are also parties to the Actions, including (i) Nick Denton, the Debtor’s founder and the current President and Chief Executive Officer of Gawker Media Group, Inc. (“GMGI”) and President of Gawker Media, LLC (“Gawker Media”, and together with GMGI, the “Company”), and (ii) certain current or former employees of the Company, including John Cook, A.J. Daulerio, Gabrielle Darbyshire, Greg Howard, JK Trotter, and Sam Biddle (the “Individual Defendants”), and (B) any Adversary Action Defendant from taking further action in the Actions and from taking further action in any other existing litigation or filing further claims against Mr. Denton or any Individual Defendant where the conduct alleged was in the course of, and within the scope of, Mr. Denton’s or the Individual Defendant’s employment with the Debtor, absent approval of this Court; and/or (2) extending the automatic stay imposed by section 362(a) of the Bankruptcy Code to stay the Actions as against Mr. Denton and the Individual Defendants.

Dated: June 10, 2016  
New York, New York

/s/ Gregg M. Galardi

Gregg M. Galardi  
David B. Hennes  
Michael S. Winograd  
ROPES & GRAY LLP  
1211 Avenue of the Americas  
New York, NY 10036-8704  
Telephone: (212) 596-9000  
Facsimile: (212) 596-9090  
gregg.galardi@ropesgray.com  
david.hennes@ropesgray.com  
michael.winograd@ropesgray.com

*Proposed Counsel to the Debtor  
and Debtor in Possession*